

# **EXHIBIT L**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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*This document relates to:*

*Burnett, et al. v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN)

Declaration of ROBERT GIALLOMBARDO

I, ROBERT GIALLOMBARDO, hereby declare under penalty of perjury:

1. I am 64 years of age and reside in Brooklyn, New York.
2. I am the stepfather of Paul Richard Salvio who was killed in the September 11, 2001 terrorist attacks at the World Trade Center in New York where he worked as a broker.
3. Paul's mother and I were married in 1976, when Paul was 2 years old.
4. Paul, his mother, and I continuously resided together in our family home from the time he was two years old until the day he died. Paul and I resided together for 25 years.
5. Paul's mother and I had three children together, and Paul was the older brother to each of them and was always looked upon by them that way.
6. Paul never knew his biological father, and his biological father played no role whatsoever in his life.
7. Paul attended private Catholic school as well as a private high school which were paid for by Paul's mother and me. Paul's biological father contributed nothing to Paul's education or any other aspect of his life.
8. Paul was in all ways my oldest son and was treated no differently than his three younger siblings. Paul was never thought of, or referred to, as a stepchild by myself, his mother,

or his three stepsiblings. All four of our children attended the same private Catholic schools and private high schools. They played together, participated in sports together, vacationed together, and in all ways interacted as normal siblings. It was extremely important to Paul's mother and I that he not be perceived as any different by his stepsiblings, and he never was.

9. Paul liked to talk and we would talk often. He would always want my opinion on events happening in his life, as well as events happening in society and the world at large. I would always give him my honest advice.
10. I always referred to Paul as my son and he always referred to me as his father. Our family, friends, and acquaintances always referred to Paul as my son, and to me as his father.
11. Since Paul's mother and I married, I did everything I could to make sure Paul felt he was my son, and Paul reciprocated by making me feel like I was his father.
12. My relationship with Paul was that of a father and son in all ways.
13. At Paul's funeral, I was approached by an elderly woman whom I had never met or seen before. She identified herself as Paul's grandmother and thanked me for raising Paul to be the fine man he was.
14. Paul was my son in all ways and his loss has had a lasting impact on our entire family.  
I declare under penalty of perjury the foregoing is true and correct.

Date: 8-16-2019

  
Robert Giallombardo